

# Attachment

1 T. RIDDER

2 - INDEX TO WITNESSES -

3 WITNESS

PAGE

4 THERESA A. RIDDER

5 Examination by Ms. Dryhurst

5

7 - INDEX TO CERTIFIED QUESTIONS -

8 Page/Line

Text of the Question

9 9 7 And what were those?

10 35 23 Can you provide an example?

11 36 21 When you started working on the

12 Navient investigation did you do

13 any research into student loans?

14 43 14 How many borrowers have you

15 interviewed for the Navient

16 investigation?

17 44 7 For how many borrowers have you

18 served as a point of contact?

19 44 14 Who selected the borrowers?

20 44 20 Do you know how the borrowers

21 were selected?

22 44 25 Did you ever receive CFPB portal

23 complaints?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 45 12 Have you ever reviewed those  
5 complaints for the Navient  
6 investigation?

7 46 22 After learning about complaints  
8 against Navient did you have any  
9 judgment on which borrowers to  
10 contact?

11 47 20 What was your goal in  
12 interviewing these borrowers?

13 47 25 Did you use an outline of  
14 questions in your discussions with  
15 borrowers?

16 48 6 Did the attorney draft the  
17 outline for your discussions with  
18 borrowers?

19 48 11 What kinds of questions did the  
20 outline include?

21 48 15 Did it include questions about  
22 IDR?

23 48 19 Did it include questions about  
24 forbearance?  
25

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 48 24 Did it include questions about  
5 IDR recertification?

6 49 5 Did it include questions about  
7 co-signer release?

8 49 9 Did it include questions about  
9 payment processing?

10 49 13 Did it include questions about  
11 credit reporting?

12 49 17 Did you ask consumers questions  
13 about IDR?

14 49 21 Those are communications with  
15 third parties?

16 49 25 Are you refusing to answer  
17 questions about your communications  
18 with third parties?

19 50 5 So you will not answer that  
20 question?

21 50 9 Did you take notes during any of  
22 your interviews with borrowers?

23 50 13 Did you memorialize your  
24 interviews in any way?

25

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 50 17 Did you provide a report to  
5 anyone summarizing your findings?

6 50 21 How did you update the CFPB team  
7 about the interviews?

8 50 25 Did you ever ask borrowers for  
9 documents?

10 51 5 On a phone call with a borrower  
11 did an attorney typically  
12 participate?

13 51 15 Was an attorney present on all  
14 of your phone calls with consumers?

15 51 21 What types of documents did you  
16 ask borrowers for?

17 51 25 Did you ever ask borrowers for  
18 documents related to forbearance?

19 52 5 Did you ever ask borrowers for  
20 documents related to IDR?

21 52 9 Did you ever ask borrowers for  
22 their loan histories?

23 52 13 Did you ever not receive  
24 borrowers you requested from a  
25 borrower?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 52 17 Did you review the documents you  
5 received from borrowers?

6 77 10 How did you first locate  
7 Ms. Bonner?

8 78 2 Do you remember reviewing the  
9 Complaint of Ms. Bonner?

10 78 22 Did someone tell you to look  
11 specifically for complaints that  
12 referenced forbearance?

13 80 10 Do you remember what led you to  
14 contact Ms. Bonner regarding this  
15 lawsuit?

16 80 16 Did you speak to anyone else at  
17 the CFPB before speaking with  
18 Ms. Bonner?

19 81 19 Was anyone else on the call?

20 81 24 Did attorneys at the CFPB tell  
21 you who to have on the call?

22 83 16 Do you remember any  
23 conversations with Ms. Bonner?

24

25

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 83 25 Did you ever ask Ms. Bonner  
5 about her communications with  
6 Navient?

7 84 7 Did you ever ask whether she had  
8 discussed IDR with Navient?

9 84 11 Did you ever ask Ms. Bonner  
10 whether she had enrolled in  
11 forbearance?

12 84 15 Did you ever ask Ms. Bonner  
13 whether she used forbearance to  
14 bring her loans current?

15 84 20 Did you ever ask Ms. Bonner for  
16 documents?

17 84 24 Did you ever ask Ms. Bonner  
18 whether she applied for IDR?

19 85 4 Did you ever ask her for  
20 documents that she received about  
21 IDR?

22 86 3 Did you take notes of the call  
23 with Ms. Bonner?

24

25

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 86 9 Did you have any other

5 communications with Bonner other

6 than the email that we just looked

7 at?

8 86 23 Did Ms. Bonner tell you that she

9 had received documents about IDR?

10 87 5 Did Ms. Bonner tell you whether

11 she had enrolled in IDR?

12 87 19 Did you draft Exhibit 216?

13 87 24 Did you send Exhibit 216 to

14 Ms. Bonner?

15 88 21 Did you review any documents to

16 prepare this declaration?

17 89 4 While preparing declarations, if

18 you had a follow-up question would

19 you call the borrower again?

20 89 9 Do you remember having follow-up

21 questions for Ms. Bonner?

22 89 13 Did anyone at the CFPB review

23 this declaration before you sent it

24 to Ms. Bonner?

25



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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 89 16 Did anyone other than an  
5 attorney at the CFPB review the  
6 declaration before you sent it to  
7 Ms. Bonner?

8 89 21 Did anyone other than an  
9 attorney review the declaration  
10 before you sent it to Ms. Bonner?

11 90 4 After Ms. Bonner received the  
12 declaration did you ask her if it  
13 was accurate?

14 90 8 Did Ms. Bonner tell you that the  
15 declaration was accurate?

16 90 12 Did Ms. Bonner suggest any  
17 changes to her declaration?

18 90 23 On what basis did you write that  
19 paragraph?

20 91 5 Did the complaint shown at  
21 Exhibit 268 mention anything about  
22 forbearance?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 91 22 Did you ask Ms. Bonner whether  
5 she recalled a specific  
6 conversation in which only  
7 forbearance was offered?

8 92 5 Did you ask Ms. Bonner for  
9 documents to corroborate paragraph  
10 9?

11 92 9 Have you reviewed Ms. Bonner's  
12 deposition transcript?

13 92 13 Were you aware that Ms. Bonner  
14 testified that that declaration was  
15 inaccurate?

16 92 24 Did you ask Ms. Porretti what  
17 kinds of loans she had?

18 93 7 Did Ms. Porretti tell you that  
19 she had parent PLUS loans?

20 93 11 Did Ms. Porretti tell you that  
21 she had a consolidated loan that  
22 made her ineligible for IDR?

23 93 16 Did you ask Ms. Porretti about  
24 her communications with Navient?  
25

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- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

	Page/Line	Text of the Question
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93	20	Did Ms. Porretti ever tell you whether she applied for IDR?
----	----	---

93	24	Did Ms. Porretti tell you she applied for IDR in 2015?
----	----	--

94	4	Did Ms. Porretti tell you whether she had enrolled in forbearance?
----	---	--

94	8	Did you ask Ms. Porretti for documents?
----	---	---

94	12	Did Ms. Porretti send you documents?
----	----	--------------------------------------

94	15	Did you take any notes of your calls with Ms. Porretti?
----	----	---

94	19	Did you have any other communications with Ms. Porretti?
----	----	--

98	20	Did you investigate that overage amount?
----	----	--

100	9	Did you have any concerns about Ms. Porretti's credibility at this point?
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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 100 16 After receiving this letter did  
5 you ask any follow-up questions of  
6 Ms. Porretti?

7 100 20 Did you ask for additional  
8 documents?

9 102 10 Does that refresh your  
10 recollection that you asked  
11 Ms. Porretti for additional  
12 documents?

13 104 5 When preparing Exhibit 114 did  
14 you review any of the documents we  
15 looked at today?

16 104 12 Did you rely on anything other  
17 than conversations with  
18 Ms. Porretti?

19 104 16 While preparing the declaration  
20 did you have any follow-up  
21 questions for Ms. Porretti?

22 104 21 Did anyone else at the CFPB  
23 review the declaration before you  
24 sent it to Ms. Porretti?

25

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 105 2 After you sent the draft to  
5 Ms. Porretti did you ask if it was  
6 accurate?

7 105 6 Did Ms. Porretti tell you it was  
8 accurate?

9 105 11 Did Ms. Porretti tell that you  
10 her loans were in forbearance from  
11 January 2011 until June 2012?

12 105 19 Did Ms. Porretti tell you that  
13 the company only offered you -- her  
14 forbearance as a repayment option  
15 from January 2012 to June -- I  
16 mean, sorry, from January 2011 to  
17 June 2012?

18 105 25 Did Ms. Porretti suggest any  
19 changes to Exhibit 114?

20 106 5 Did you make any changes to  
21 Exhibit 114?

22 106 9 Did you have any basis for  
23 writing paragraph 5?

24 106 13 Did you ask for documents to  
25 corroborate paragraph 5?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 106 20 Were you aware that Navient sent  
5 Ms. Porretti an application for an  
6 unemployment deferment in  
7 January 2011?

8 107 4 Are you aware that Ms. Porretti  
9 testified that she didn't know the  
10 difference between deferment and  
11 forbearance?

12 107 23 How did you first locate  
13 Ms. Dinnoo?

14 109 25 What about this email led you to  
15 respond to Ms. Dinnoo in that  
16 fashion?

17 110 7 Did it have anything to do with  
18 Ms. Dinnoo saying she would love to  
19 speak with someone?

20 110 12 Did you speak with anyone other  
21 than an attorney before speaking  
22 with Ms. Dinnoo?

23 111 13 Did Ms. Dinnoo ask you if her  
24 loans could be forgiven by  
25 participating in this lawsuit?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 111 21 Did Ms. Dinnoo ask whether she  
5 could receive any money from this  
6 lawsuit?

7 112 7 Did she tell you how she had  
8 been victimized?

9 112 14 Did Ms. Dinnoo tell you about  
10 her communications with Navient?

11 112 18 Did Ms. Dinnoo tell you whether  
12 she had ever applied for IDR?

13 112 22 Did Ms. Dinnoo ever tell you  
14 whether she had enrolled in IDR?

15 113 2 Did Ms. Dinnoo tell you whether  
16 she had ever enrolled in  
17 forbearance?

18 113 6 Did Ms. Dinnoo tell you that she  
19 had used forbearance to bring her  
20 loans current when she was past  
21 due?

22 113 11 Did you ask Ms. Dinnoo for  
23 documents?

24 113 25 Did you ask her for documents  
25 about forbearance?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 114 14 Did Ms. Dinnoo tell you anything  
5 about her income?

6 114 20 Did Ms. Dinnoo tell you whether  
7 she had any valuable assets?

8 114 24 Did you take any notes of your  
9 calls with Ms. Dinnoo?

10 118 2 Had you asked for copies of the  
11 info she had?

12 118 9 Is the phone discussion she's  
13 referring to the January 27, 2017  
14 conversation?

15 118 12 Do the words "phone discussion"  
16 refer to the conversation you had  
17 with Ms. Dinnoo on January 27,  
18 2017?

19 119 15 Did you ask Ms. Dinnoo for any  
20 documents to corroborate that  
21 statement?

22 119 21 Did Ms. Dinnoo send any  
23 documents that corroborated that  
24 statement?  
25



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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 119 25 Did Ms. Dinnoo send any  
5 documents regarding what options  
6 had been offered to her by Navient?

7 128 18 In February 2017 did you review  
8 the terms of a Federal Stafford  
9 Loan master promissory note?

10 129 6 Did you review the terms of 2002  
11 FFELP promissory notes at this  
12 time?

13 133 7 Did you review the attachments  
14 to Ms. Dinnoo's letter?

15 133 19 Did you ask Ms. Dinnoo for any  
16 more information about the  
17 repayment options that were offered  
18 to her?

19 134 2 Did Ms. Dinnoo provide you with  
20 any more information about whether  
21 she had enrolled in forbearance?

22 134 7 Why did Ms. Dinnoo not include  
23 any information about IDR?

24 134 12 Did you ask for any about IDR to  
25 be attached?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 134 23 Did you investigate any of these  
5 entities other than Navient?

6 135 21 Did you rely on any documents to  
7 draft Exhibit 277?

8 136 3 While preparing Exhibit 277, did  
9 Ms. Dinnoo provide with you any  
10 additional information?

11 136 8 Did anyone who was not an  
12 attorney at the CFPB review the  
13 declaration before you sent it to  
14 Ms. Dinnoo?

15 136 13 After you sent the draft to  
16 Ms. Dinnoo, did you ask you if it  
17 was accurate?

18 136 17 Did Ms. Dinnoo tell you will it  
19 was accurate?

20 136 21 Did Ms. Dinnoo suggest any  
21 changes?

22 136 24 Did you make any changes to  
23 Exhibit 277?

24 137 10 What was the basis of that  
25 statement?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 137 15 Did any of the documents  
5 attached in Exhibit 285 support  
6 paragraph 7?

7 137 19 Did any of the documents in  
8 Exhibit 287 say that Sallie Mae and  
9 later Navient had repeatedly told  
10 Ms. Dinnoo her best and only  
11 repayment option for outstanding  
12 student loans was forbearance?

13 139 3 Did you ask Ms. Dinnoo about  
14 that inconsistency?

15 139 13 Did Ms. Dinnoo tell you she had  
16 spoken on the phone to Navient  
17 representatives about IDR?

18 139 21 Did Ms. Dinnoo tell you that at  
19 times she refused to tell Navient  
20 representatives about her financial  
21 situation in order to determine  
22 what repayment options she  
23 qualified for?

T. RIDDER

- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

	Page/Line	Text of the Question
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140	4	Did Ms. Dinnoo tell you that Navient had sent her an IDR application in 2015?
-----	---	---

141	24	How did you first locate Mr. Brown?
-----	----	-------------------------------------

142	22	Was anyone else on the call when you spoke to Mr. Brown?
-----	----	--

143	10	Did Mr. Brown ask whether his loans could be forgiven if he participated in this lawsuit?
-----	----	---

143	17	Did Mr. Brown ask whether he would receive money from participating in this lawsuit?
-----	----	--

144	7	Did Mr. Brown tell you about his communications with Navient?
-----	---	---

144	13	Did Mr. Brown tell you whether he had ever discussed IDR on the phone with Navient?
-----	----	---

144	17	Did Mr. Brown tell you whether he had ever enrolled in forbearance with Navient?
-----	----	--

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 144 21 Did you ask Mr. Brown for any  
5 documents?

6 145 5 Did you ask him to send you any  
7 documents relevant to forbearance?

8 145 16 Did you ask Mr. Brown for  
9 documents related to IDR?

10 146 3 Did Mr. Brown tell you about his  
11 employment history?

12 146 9 Did he tell you that he was  
13 enrolled in unemployment  
14 deferments?

15 146 13 Did he ever tell you that he was  
16 unemployed?

17 146 17 Did Mr. Brown ever tell you he  
18 was an economic hardship deferment?

19 146 21 Did he ever tell you whether he  
20 qualified for economic hardship  
21 deferment?

22 146 25 Did you take any notes of any  
23 calls with Brown?

24 147 5 Do any notes exist of a call  
25 with Mr. Brown?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 149 23 Do you recall asking Mr. Brown  
5 for information about his Navient  
6 and Great Lakes loans?

7 150 22 Do you recall asking Mr. Brown  
8 to send you his loan details for  
9 Navient?

10 152 3 Did you ask Mr. Brown to provide  
11 this document?

12 152 9 In the email above, you say:  
13 "Joshua, thank you." Why did you  
14 thank Mr. Brown for sending this  
15 email?

16 152 22 Does that refresh your  
17 recollection that you asked  
18 Mr. Brown to send an email about  
19 forbearance approval?

20 153 5 Did you ask Mr. Brown to send  
21 you any information he received  
22 from Navient about IDR?

23 153 9 Did your supervisors direct you  
24 not to request documents discussing  
25 IDR from Mr. Brown?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 154 4 Did you rely on any documents to  
5 draft Exhibit 109?

6 154 10 Did you rely on anything other  
7 than conversations with Mr. Brown  
8 to draft this declaration?

9 154 15 While drafting Exhibit 109, did  
10 you have any follow-up questions  
11 for Mr. Brown?

12 154 19 Did Mr. Brown provide you with  
13 any additional information?

14 154 23 Did anyone else at the CFPB  
15 review the declaration before you  
16 sent it to Mr. Brown?

17 155 4 After you sent the draft to  
18 Mr. Brown, did you ask if it was  
19 accurate?

20 155 8 Did Mr. Brown tell you it was  
21 accurate?

22 156 8 Did you rely on Exhibit A when  
23 drafting the declaration?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 156 14 Do you understand the CFPB to be  
5 relying on the declaration of  
6 Mr. Brown?

7 156 18 Does this refresh your  
8 recollection on whether you asked  
9 Mr. Brown for any documents related  
10 to IDR?

11 156 23 Why did you attach Exhibit A to  
12 the declaration?

13 157 9 What did you rely on to write  
14 that statement?

15 157 15 Is it a fair assumption that you  
16 relied on the email that you  
17 attached to the declaration that is  
18 filed in this case?

19 160 22 Why not?

20 161 7 Did you ask for such  
21 communications from Mr. Brown?

22 162 23 Did someone direct you not to  
23 attach Exhibit 100 to Mr. Brown's  
24 declaration?

25



1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 163 16 What was your basis for drafting  
5 paragraph 6 of Mr. Brown's  
6 declaration?

7 165 17 Does that mean that it was  
8 optional for attorneys to end calls  
9 with consumers?

10 165 23 Did you tell Ms. Harris that she  
11 did not have to attend this call  
12 with Ms. Bradley?

13 166 3 Do the words on the page  
14 indicate that you told Ms. Tucker  
15 she did not need to participate in  
16 this call?

17 166 18 Why is there no draft  
18 declaration for Ms. Bradley?

19 167 4 How did you first locate  
20 Mr. Papson?

21 173 3 Is that part of your outline?

22 173 23 Did you ever tell Ms. Papson  
23 what kind of information she should  
24 provide for the call?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 175 8 Did the Papsons ever tell you  
5 that they were hoping their loans  
6 would be forgiven by participating  
7 in this lawsuit?

8 175 15 Did the Papsons ever tell you  
9 that they would like to receive  
10 money through their participation  
11 in this lawsuit?

12 175 20 Did Mr. Papson tell you about  
13 his communications with Navient?

14 175 24 Did Mr. Papson ever tell you  
15 about whether he had enrolled in  
16 IDR?

17 176 22 Did the Papsons ever tell you  
18 whether they had enrolled in  
19 forbearance?

20 179 17 Did you take notes of your calls  
21 with the Papsons?

22 180 3 Do any notes exist of the calls  
23 with the Papsons?

24

25

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 180 7 Were you aware that Navient sent  
5 Mr. Papson an IDR application as  
6 early as 2010?

7 180 11 Was there a declaration prepared  
8 for Mr. Papson to sign?

9 180 19 How did you first locate  
10 Mr. Neal?

11 181 15 Did you review this complaint  
12 from Mr. Neal?

13 183 7 Did you ask Mr. Neal whether he  
14 qualified for IDR?

15 183 13 Did Mr. Neal tell you whether he  
16 qualified for IDR?

17 184 25 Do you know why then that the  
18 CFPB is relying him for claims that  
19 relate to federal loans?

20 187 21 What led to you contact  
21 Mr. Neal?

22 188 19 So you mentioned to Mr. Neal  
23 that you had had some conversations  
24 with peers regarding his complaint;  
25 is that right?

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 189 2 Does Mr. Neal have the  
5 understanding that you mentioned  
6 you had some conversations you had  
7 to have with peers regarding his  
8 specific complaint?

9 189 13 How was his complaint outside  
10 the scope of the current CFPB  
11 complaint?

12 189 19 Did you tell Mr. Neal that his  
13 situation was somewhat outside the  
14 scope of the current CFPB  
15 complaint?

16 190 2 Did Mr. Neal ever tell you that  
17 he called Navient and was told that  
18 he was not eligible for IDR?

19 190 23 Is that something that would  
20 have been relevant?

21 191 6 Did Mr. Neal provide you with  
22 his income?

23 191 12 Did the CFPB ever prepare a  
24 declaration for Mr. Neal?

25

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 191 16 Did Mr. Neal ever refuse to sign  
5 a declaration that was drafted by  
6 you?

7 191 24 How did you first locate  
8 Mr. Jaklevich?

9 192 24 Did you review Mr. Jaklevich's  
10 complaint?

11 193 18 Did any borrower ever tell you  
12 they were steered into forbearance  
13 by Navient?

14 194 18 Did Mr. Jaklevich ask you if his  
15 loans could be forgiven by  
16 participating in this lawsuit?

17 194 25 Did Mr. Jaklevich ask you if he  
18 might receive money from  
19 participating in this lawsuit?

20 195 6 Did Mr. Jaklevich tell you about  
21 his communications with Navient?

22 195 10 Did Mr. Jaklevich tell you that  
23 he had been enrolled for several  
24 years prior to filing his  
25 complaint?

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 196 19 Did you draft a declaration for  
5 Mr. Jaklevich?

6 197 18 How did you first locate  
7 Ms. Evans?

8 198 7 Did you review Ms. Evans'  
9 complaint?

10 198 19 Did Ms. Evans ever tell you that  
11 she had been coaxed into  
12 forbearance by Navient?

13 198 25 Did Ms. Evans tell that you she  
14 had received information about IDR?

15 199 5 Did Ms. Evans tell you whether  
16 she had applied for IDR?

17 199 9 Did Ms. Evans ever tell you that  
18 she had enrolled in forbearance?

19 199 13 Did she tell you that the only  
20 forbearances she ever received were  
21 to provide time to apply for IDR?

22 200 3 Did you ask Ms. Evans for any  
23 documents?

24 200 9 Did anyone at the CFPB draft a  
25 declaration for Ms. Evans?

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- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

	Page/Line	Text of the Question
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200	13	Were you aware that the CFPB sent her a draft declaration that she did not sign because it was inaccurate?
-----	----	--

201	17	Did you review this complaint?
-----	----	--------------------------------

201	25	Did you review any complaints from prior to January 18, 2017 for purposes of the Navient investigation?
-----	----	---

204	12	Did Ms. Falck ever discuss IDR with you?
-----	----	--

204	18	Did Mrs. Falck ever complain about forbearance to you?
-----	----	--

204	22	Did Ms. Falck ever ask whether her loans could be forgiven by participating in this lawsuit?
-----	----	--

205	3	Did Ms. Falck ever ask whether she could receive any money from participating in this lawsuit?
-----	---	--

205	8	Did Ms. Falck tell you about her communications with Navient?
-----	---	---

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2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 205 12 Did Ms. Falck tell you that she  
5 had discussed IDR with Navient  
6 representatives on the phone?

7 205 17 Did Ms. Falck tell you she had  
8 used forbearances to bring her  
9 loans current after falling  
10 delinquent?

11 205 22 Did you ask Ms. Falck for any  
12 documents?

13 206 10 Did you draft a declaration for  
14 Ms. Falck?

15 206 16 Did Ms. Falck ever refuse to  
16 sign a declaration drafted by the  
17 CFPB?

18 206 25 How did you first locate  
19 Ms. Harris?

20 207 9 Did Ms. Harris ask whether her  
21 loans could be forgiven by  
22 participating in this lawsuit?

23 207 16 Did Ms. Harris ever ask you  
24 whether she could receive any money  
25 by participating in this lawsuit?



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- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

	Page/Line	Text of the Question
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207	21	Did Ms. Harris tell you about her communications with Navient?
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207	25	Did Ms. Harris tell you about any discussion she had with Navient about IDR?
-----	----	--

208	5	Did Ms. Harris tell you whether she had ever enrolled in forbearance?
-----	---	---

208	9	Did you ask Ms. Harris for any documents?
-----	---	---

208	17	Did Ms. Harris tell you that she had enrolled in IDR at some point?
-----	----	---

208	23	Did Ms. Harris ever refuse to sign a draft declaration?
-----	----	---

209	11	How did you first locate Ms. Slobodian?
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210	9	Did you review this complaint?
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211	2	Did you ask Ms. Slobodian whether she had received any other forbearances?
-----	---	--

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 211 8 Did Ms. Slobodian tell you about  
5 any other forbearances she  
6 received?

7 211 12 Do you know what she meant by  
8 wanting her loans dissolved?

9 213 8 Did Ms. Slobodian ask whether  
10 she could have her loans forgiven  
11 by participating in this lawsuit?

12 213 15 Did Ms. Slobodian ask whether  
13 she could receive any money from  
14 participating in this lawsuit?

15 213 20 Did Ms. Slobodian tell you about  
16 her communications with Navient?

17 213 24 Did Ms. Slobodian tell you that  
18 she has been aware of IDR since at  
19 least 2009?

20 214 4 Did she tell you whether she had  
21 ever discussed IDR on the phone  
22 with Navient?

23 214 8 Did Ms. Slobodian tell you  
24 whether she had ever enrolled in  
25 forbearance?

T. RIDDER

- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

	Page/Line	Text of the Question
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214	17	Did she tell you that she was ineligible for IDR?
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214	23	Did Ms. Slobodian ever refuse to sign a declaration drafted by the CFPB?
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216	8	Did you ever ask Mr. Redd whether he had hung up on Navient representatives?
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217	6	Did you ever ask Mr. Redd whether he used very colorful language with Navient representatives?
-----	---	--

218	3	Did you ever ask Mr. Redd why Navient contacted corporate security?
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218	13	How did you first locate Ms. Cox?
-----	----	-----------------------------------

220	11	Did Ms. Cox ever tell you whether she was able to resolve her payment processing issues with Navient?
-----	----	---

1 T. RIDDER

2 - INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

3 Page/Line Text of the Question

4 220 18 Did she say whether Navient ever  
5 followed her payment allocation  
6 instructions?

7 220 22 Did Ms. Cox ever refuse to sign  
8 a declaration drafted by the CFPB?

9 222 11 Did Ms. Threlkel tell you  
10 whether her payment processing  
11 issues with Navient were resolved?

12 222 18 Did Ms. Threlkel ever refuse to  
13 sign a declaration drafted by the  
14 CFPB?

15 225 14 Did you ask Mr. Williams for  
16 documents from FICO?

17 225 20 Did Mr. Williams tell you why he  
18 was sending you something from  
19 FICO?

20 227 6 Did you ask Mr. Williams whether  
21 the credit information provided by  
22 Navient was accurate?

23 227 13 Did you ask Mr. Williams for any  
24 other documents?  
25

T. RIDDER

- INDEX TO CERTIFIED QUESTIONS (Cont'd.) -

Page/Line	Text of the Question
228 5	After receiving this letter from Mr. Williams did you ask him whether the information provided by Sallie Mae to the credit bureaus was accurate?

- INDEX TO MARKED EXHIBITS -

NO.	DESCRIPTION	MARKED
Exhibit No. 627	Deposition Notice	18
Exhibit No. 628	Email chain	79
Exhibit No. 629	Email chain	101
Exhibit No. 630	Porretti tax information	102
Exhibit No. 631	Email chain	147
Exhibit No. 632	Email	149
Exhibit No. 633	Loan details - Brown	150
Exhibit No. 634	Email	151
Exhibit No. 635	Meeting notes	164
Exhibit No. 636	Email chain	167
Exhibit No. 637	Email chain	215
Exhibit No. 638	Email chain	223
Exhibit No. 639	FICO letter	226